

ENGINEERING MANAGEMENT SUPPORT INC.

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October 10, 2015

VIA: Electronic Mail

U.S. Environmental Protection Agency
Region VII SUPR/MOKS
11201 Renner Boulevard
Lenexa, KS 66219

ATTENTION: Mr. Bradley Vann

SUBJECT: Monthly Progress Report – September 2015
Removal Action – Preconstruction Work
West Lake Landfill Superfund Site, Bridgeton, Missouri

Dear Mr. Vann,

On behalf of Bridgeton Landfill, LLC., and Rock Road Industries, Inc. (the "Respondents"), Engineering Management Support Inc. (EMSI) submits the attached progress report for the month of August 2015 as required by paragraph 34a of the Administrative Settlement Agreement and Order on Consent (ASAOC), EPA Docket No. CERCLA-07-2014-0002. If you have any questions or desire additional information related to this status report or any other aspect of the project, please do not hesitate to contact me.

Sincerely,
ENGINEERING MANAGEMENT SUPPORT, Inc.



Paul V. Rosasco, P.E.

Distribution:

Lynn Juett – EPA Region VII
Brian Power – Bridgeton Landfill LLC
Joe Benco – Republic Services, Inc.
Jessie Merrigan – Lathrop & Gage
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Mike Bollenbacher – Auxier & Associates
Randy Bodnar – Civil & Environmental Consultants

Monthly Status Report – September 2015
West Lake Landfill Operable Unit 1
Bridgeton, Missouri

This status report has been prepared by Engineering Management Support Inc. (EMSI) on behalf of Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC (formerly known as Laidlaw Waste Systems [Bridgeton] Inc.), Rock Road Industries, Inc., and the United States Department of Energy (the “Respondents”) for Operable Unit - 1 (OU-1) at the West Lake Landfill as required by paragraph 56 of the West Lake Landfill Administrative Order on Consent, Docket No. VII-93-F-005.

1. Work Performed During September 2015

Project Planning

A final work plan for the Phase 1D investigation along with responses to EPA’s April 24, 2015 comments were submitted to EPA on May 1, 2015. EPA approved this revised work plan, with comments, on May 5, 2015. Responses to the comments included in EPA’s letter approving the May 1, 2015 version of the Work Plan Addendum for Phase 1D along with revised responses to EPA’s April 24, 2015 comments were submitted on May 23, 2015.

In an April 20, 2015 letter to the OU-1 Respondents, EPA requested the Respondents to conduct additional soil borings and sampling in Areas 1 and 2. A Work Plan for Additional Characterization of Areas 1 and 2 was submitted to EPA on July 6, 2015. EPA comments on the Work Plan were received via electronic mail on July 31, 2015. MDNR comments on the Work Plan were also received via electronic mail on this same date. Responses to these comments were prepared and submitted to EPA and MDNR on August 4 and August 14, 2015. EPA provided conditional approval of the Work Plan on August 21, 2015. A revised Work Plan incorporating the responses to comments and addressing additional issues identified in EPA’s August 21, 2015 letter was prepared and submitted to EPA on August 28, 2015. On September 1, 2015, MDNR provided comments on the August 14, 2015 responses to comments. On September 3, 2015, EPA partially approved the revised Work Plan with additional comments/conditions and authorized the Respondents to begin the work. On September 4, 2015, Bradley Vann of EPA contacted Paul Rosasco of EMSI by telephone with instructions to stop all work pending review of expert reports filed by the Missouri Attorney General. On September 17, 2015, EPA approved commencement of the work. Responses to EPA’s additional comments/conditions and a final Work Plan were submitted to EPA on September 22, 2015. Final responses to MDNR’s comments on the August 14, 2015 responses to comments were submitted to EPA and MDNR on October 3, 2015.

A revised Work Plan for Partial Excavation Alternative that includes all three partial excavation options identified by EPA and also includes the results of the additional characterization of Areas 1 and 2 was prepared and submitted to EPA on July 23, 2015.

A revised Work Plan for Alternative Area Excavation Depths and Volumes that includes the results of the additional characterization of Areas 1 and 2 was prepared and submitted to EPA on July 23, 2015.

A revised work plan for performance of fate and transport evaluations was submitted to EPA and MDNR on September 4, 2014. EPA comments on the revised work plan for performance of fate and transport evaluations were received on December 19, 2014. A conference call was held with EPA on February 10, 2015 to discuss EPA comments on the revised work plan for fate and transport evaluations. A revised work plan was submitted to EPA and MDNR on August 5, 2015.

A draft Remedial Design Work Plan was submitted to EPA in November 2008. In accordance with direction from EPA, all work on design of the ROD-selected remedy has been put on hold.

Fieldwork - Sample Collection/Analysis

Air quality monitoring activities were performed pursuant to the EPA-approved Air Monitoring, Sampling and QA/QC Plan.

Laboratory analyses of samples from the Phase 1D investigation were performed during this period.

Report Preparation

EPA comments on the Bridgeton Landfill Thermal Isolation Barrier Investigation Phase 1 report (the Phase 1 report) were received on March 9, 2015. MDNR and MDHSS comments were received on April 10, 2015. Preparation of responses to all of the comments on the Phase 1 report were completed by Feezor Engineering, Inc. during this period and the responses to comments were submitted to EPA and MDNR on August 25, 2015.

EMSI received EPA comments on the Isolation Barrier Alternatives Analysis (IBAA) via electronic mail on March 10, 2015. Preparation of responses to these comments was performed during this period. Via an electronic mail dated March 31, 2015, EPA subsequently extended the period for preparation of responses to comments from the initially required period of 30 days to a period of 90 days, making the responses to comments due on June 9, 2015. EPA also indicated that only certain comments, specifically those related to radon flux, needed to be responded to by this date. Responses to those comments related to radon flux calculations were submitted to EPA on June 9, 2015. Via a July 23, 2013 electronic mail, EPA indicated that responses to the

remaining comments should be submitted by August 22, 2015. A request for an extension for an additional 45 days was made to and subsequently granted by EPA such that the responses to comments are now due on October 6, 2015. Responses to the remaining comments were submitted to EPA on October 6, 2015.

EPA approval of the apatite technology evaluation work plan was received on March 20, 2015 and work related to the evaluation of apatite treatment technologies was performed during this period.

The monthly progress report for August 2015 was prepared and submitted to EPA and MDNR on September 10, 2015.

Project Management

None.

Meetings

None.

Correspondence

As noted above, the Work Plan for Additional Characterization of Areas 1 and 2 was submitted to EPA on July 6, 2015 and EPA comments were received on July 31, 2015. MDNR comments were also received on this date. Responses to these comments were prepared and submitted to EPA and MDNR on August 4, 2015 and August 14, 2015. EPA conditional approval of these responses was received on August 21, 2015. A revised Work Plan was submitted to EPA and MDNR on August 28, 2015. On September 1, 2015, MDNR provided comments on the August 14, 2015 responses to comments. EPA partially approved the revised Work Plan with additional comments/conditions on September 3, 2015, and authorized the Respondents to begin the work. On September 4, 2015, Bradley Vann of EPA contacted Paul Rosasco of EMSI by telephone with instructions to stop all work pending review of expert reports filed by the Missouri Attorney General. On September 17, 2015, EPA approved commencement of the work. Responses to EPA's additional comments/conditions and a final Work Plan were submitted to EPA on September 22, 2015. Final responses to MDNR's comments on the August 14, 2015 responses to comments were submitted to EPA and MDNR on October 3, 2015.

2. Analytical Data Collected During This Reporting Period

The following analytical reports were received during this period:

Air Monitoring Samples

- ☐ Eurofins AirToxics Laboratory reports 1508083 and 1508373; and
- ☐ Eberline Analytical Laboratory reports 1508105 and 1508105 and revised report 1507182.

Phase 1D Core Samples

- ☐ Eberline Analytical Laboratory reports 1507182 and 1508002.

Due to the size of the files for these reports, they are being transmitted separately using the file transfer service, WeTransfer.

3. Work Scheduled to be Performed during October and November 2015

The following activities are expected to be performed during the upcoming two months:

- ☐ Continuation of air monitoring activities in accordance with the EPA-approved Air Monitoring, Sampling and QA/QC Plan;
- ☐ Pursuant to EPA approval of the Work Plan for Additional Characterization of Areas 1 and 2, begin site preparation work and conduct drilling and sampling activities;
- ☐ Review and validation of the laboratory data from the air monitoring program;
- ☐ Review and validation of laboratory data from the Phase 1D core samples;
- ☐ Preparation of a Comprehensive Phase 1 Investigations Report;
- ☐ Subject to EPA approval of the revised fate and transport work plan, begin performance of fate and transport evaluations;
- ☐ Evaluation of apatite treatment technologies; and
- ☐ Continued work on verifying and assembling historic site data into a form suitable for loading into EQUIS.

4. Problems Encountered

None.

Laboratory Analytical Reports

Note:

Due to the size of the electronic files of the laboratory analytical reports, these files were transmitted separately from this report.